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**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**FEREYDUN TABAIAN and AHMAD  
ASHRAFZADEH,**

Case No.: 3:18-cv-0326-HZ

Plaintiffs,

v.

**DEFENDANT INTEL  
CORPORATION'S UNOPPOSED  
MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFFS'  
COMPLAINT**

**INTEL CORPORATION,**

Defendant.

**CERTIFICATE OF COMPLIANCE**

Pursuant to LR 7-1(a), counsel for defendant Intel Corporation certify that they conferred with Plaintiffs by telephone conference on March 5, 2018, and Plaintiffs do not oppose this motion.

**MOTION**

Pursuant to Federal Rule of Civil Procedure 6(b)(1), Intel Corporation respectfully moves to extend the time to respond to Plaintiffs' Complaint until April 16, 2018.

### **ARGUMENT**

Federal Rule of Civil Procedure 6 provides that a court may extend the time for a party to act for “good cause.” Fed. R. Civ. P. 6(b)(1); *see also* LR 16-3. Intel Corporation was served with the Complaint on February 24, 2018. The deadline for its response is March 19, 2018. However, defendant Intel Corporation respectfully requests a 30-day extension, through and including April 16, 2018, within which to respond to the Complaint, so that it may gather the information necessary to respond to the Complaint.

This motion is filed in good faith and not for any improper purpose or undue delay.

### **CONCLUSION**

Intel Corporation respectfully requests that the Court extend its time to respond to Plaintiffs’ Complaint until April 16, 2018.

DATED this 7th day of March, 2018.

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By: /s/ Renée E. Rothauge

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